

1 KEVIN V. RYAN (CSBN 118321)  
United States Attorney

2 EUMI L. CHOI (WVBN 0722)  
3 Chief, Criminal Division

4 CHRISTINA HUA (CSBN 185358)  
CYNTHIA STIER (DCBN 423256)  
5 Assistant United States Attorneys  
450 Golden Gate Avenue, Box 36055  
6 San Francisco, California 94102-3495  
Telephone: (415) 436-7534  
7 FAX: (415) 436-7234  
Attorneys for Plaintiff

8 UNITED STATES DISTRICT COURT  
9  
10 NORTHERN DISTRICT OF CALIFORNIA  
11  
12 SAN FRANCISCO DIVISION

12 UNITED STATES OF AMERICA, ) No. CR 06-0144 JSW

13 Plaintiff, )

14 v. )

15 RENATO MENDOZA MEDINA, )  
a/k/a Rene Mendoza Medina, )  
16 PHYLLIS REYES CUISON, )  
a/k/a Phyllis Cundangan Reyes, and )  
17 RAWLIN CUNDANGAN REYES, )

18 Defendants. )

**STIPULATION AND  
[PROPOSED] ORDER REGARDING  
EXCLUSION OF TIME**

19 The defendants came before the Court for a status/trial setting appearance on June 15, 2006.  
20 The matter was set over until August 17, 2006 at 2:30 p.m. before the Court for a status hearing.  
21 The parties agreed, and the Court found, that the time between June 15, 2006 through August 17,  
22 2006 is properly excluded under the Speedy Trial Act, Title 18, United States Code, Sections  
23 3161(h)(8)(A) and (h)(B)(ii) and (iv). The parties agree, and the Court previously found that,  
24 that the case was complex, due to the nature of the crime, the number of different entities, bank  
25 accounts, and identities involved, and the large amount of discovery which the defense needs to  
26 review. The defendants represented that this delay is necessary so that they can continue to  
27 review discovery and hire an expert to analyze the various bank accounts. Due to the complexity  
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of this matter and the need for the defendants to prepare their case by reviewing the voluminous discovery and using an expert to analyze the various accounts, failure to grant the requested continuance would unreasonably deny the defense the reasonable time necessary for effective preparation. The parties agree that the continuance from June 15, 2006 through August 17, 2006 is also necessary due to continuity of defense counsel, given the need for defense counsel to spend time preparing the instant case and other cases during this time period. The parties agree that the ends of justice served by granting the requested continuance outweigh the best interest of the public and the defendants in a speedy trial.

DATED: June 26, 2006

/s/ Christina Hua  
CHRISTINA HUA  
Assistant United States Attorney

DATED: June 26, 2006

Cristina C. Arguedas  
CRISTINA C. ARGUEDAS  
Counsel for Renato Mendoza Medina

DATED: June 26, 2006

/s/ Lidia Stiglich  
LIDIA STIGLICH  
Counsel for Rawlin Cundangan Reyes

DATED: June 26, 2006

/s/ Ann Moorman  
ANN MOORMAN  
Counsel for Phyllis Reyes Cuison

#### ORDER

For the foregoing reasons, and as stated on the record at the June 15, 2006 hearing in this matter, the Court HEREBY ORDERS the period between June 15, 2006 and August 17, 2006 is excluded from the speedy trial calculation under Title 18, United States Code, Sections 3161(h)(8)(A) and (h)(B)(ii) and (iv). The Court finds that the failure to grant the requested continuance would unreasonably deny defense counsel the reasonable time necessary for effective preparation, given the complexity of this case and the need for continuity of counsel. The Court finds that the ends of justice served by granting the requested continuance outweigh the best interest of the public and the defendant in a speedy trial and in the prompt disposition of

1 criminal cases.

2 IT IS SO ORDERED.

3 DATED: June 28, 2006

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JEFFREY S. WHITE  
United States District Judge